

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

ERIC S. MOORE, SR., <i>et al.</i> , individually )	
and on behalf of all other similarly situated )	
individuals, )	
)	
Plaintiffs, )	
v. )	Civil Action No. 3:14-cv-832 (DJN)
)	
SHAPIRO, BROWN & ALT, LLP, <i>et al.</i> , )	
)	
Defendants. )	
)	

**PLAINTIFFS' MOTION TO COMPEL NON-PARTY FIRST FINANCIAL TITLE  
AGENCY OF VIRGINIA, INC. TO PROVIDE FULL AND COMPLETE RESPONSE TO  
PLAINTIFFS' SUBPOENA DATED JUNE 8, 2015**

COMES NOW the Plaintiffs, by counsel, pursuant to Rule 37 and Rule 45 of the Federal Rules of Civil Procedure and moves this Court to enter the Proposed Order attached hereto compelling non-party First Financial Title Agency of Virginia, Inc. ("FFTAV") to provide a full and complete response to Plaintiffs' subpoena dated June 8, 2015, for the reasons set forth in the Memorandum of Law filed contemporaneously herewith.

Plaintiffs certify pursuant to Local Rule 37 that their counsel have met and conferred with FFTAV's counsel through multiple telephone calls and e-mail over the course of several weeks to resolve the issues in this motion.

Respectfully submitted,

**PLAINTIFFS**

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of October, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to the following:

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